

1 IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
2 SECOND APPELLATE DISTRICT
3 DIVISION

4 Civ. No. B _____
(Super. Ct. No. C420153)

5 CHURCH OF SCIENTOLOGY OF CALIFORNIA
6 and MARY SUE HUBBARD,

7 Plaintiff-Petitioners,

8 -against-

9 GERALD ARMSTRONG,

10 Defendant.

11 CHURCH OF SCIENTOLOGY OF CALIFORNIA
12 and MARY SUE HUBBARD,

13 Petitioners

14 -against-

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 FOR THE COUNT OF LOS ANGELES,

17 Respondents.

18 BENT CORYDON, Real Party in Interest

19 Response From the Superior Court of California
20 County of Los Angeles
21 Judge Bruce R. Geernaert

22 RESPONSE TO EMERGENCY MOTION FOR PARTIAL RECONSIDERATION
23 OF TEMPORARY STAY ORDER, AND FOR CANCELLATION

24 STAY ORDER

25 PAUL MORANTZ
26 A PROFESSIONAL CORPORATION
27 P.O. Box 511
28 Pacific Palisades CA 90272
(213)459-4745

Counsel for Respondent

1 TO JUSTICES OF THE COURT TO APPEAL, DIVISION 4:

2 1. This response is to the Emergency Motion for Partial
3 Reconsideration of Temporary Stay Order, and for Clarification.

4 2. Petitioners have moved the court to set aside the
5 temporary order on the grounds of what they feel to be an unfair
6 settlement offer by Mr. Corydon is other counsel concerning
7 various lawsuits Corydon has against Scientology entities and
8 individuals.

9 3. This office represents Mr. Corydon only in Judicial
10 Counsel Proceeding Number 2151, two defamation lawsuits brought
11 by Presidents of Scientology Corporations.

12 4. While it follows that if said cases were dismissed,
13 this office would not have a need for purposes of defending said
14 cases to inspect the Armstrong file, the fact remains that this
15 office did not participate in, nor authorize, any settlements
16 proposals mentioned in this motion.

17 5. The letter of Mr. Sayre attached to the Declaration of
18 Mr. Drescher was not made with either consultation, nor
19 authority, of this office. Nor does it mention, nor relate to
20 said defamation actions, nor provide for dismissal of same.

21 6. It is not the undersigned's understanding that the
22 settlement demand is materially different than what had existed
23 prior thereto, but, more importantly, settlement discussions are
24 not relevant. It is hoped this attempt to prejudice and
25 confuse issues will not succeed.

26 Respectfully Submitted,

27 Date: 12-30-88

28 Paul Morantz
PAUL MORANTZ

1 STATE OF CALIFORNIA, COUNTY OF

2 I am the _____

3
4 in the above entitled action or proceeding; I have read the foregoing _____

5
6 and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which
7 are therein stated upon my information or belief, and as to those matters I believe it to be true.

8
9
10 I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

11 Executed on _____ at _____ California
(date) (place)

12
13 L. _____
(Signature)

14
15 PROOF OF SERVICE BY MAIL (1013a, 2015.5 C. C. P.)

16 STATE OF CALIFORNIA, COUNTY OF

17 I am a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled
18 action; my business address is:

19 P.O. Box 511, Pacific Palisades, Ca. 90272

20 On December 30, 1988, I served the within N z Response to Emergency
21 Motion for Partial Reconsideration of Temporary Stay Order, and for
22 cancellation

23 on the Parties
24 in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the
25 United States mail at _____
26 addressed as follows:

27 see attached list

28 I do this under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
Executed on 12/30/88 at Pacific Palisades California
(date) (place)

Proof of Service

Mr. Kendrick Moxon
Mr. Timothy Bowles
6255 Sunset Boulevard
Suite 2000
Los Angeles CA 90028

Mr. Eric Lieberman
Rabinowitz, Boudin, Standard,
Krinsky, & Lieberman, P.C.
740 Broadway at Astor Place
Fifth Floor
New York, New York 10003

Ms. Toby Plevin
Sayre, Moreno, Purcell & Boucher
10866 Wilshire Boulevard
Fourth Floor
Los Angeles, CA 90024

Clerk of Superior Court
Los Angeles County
111 North Hill Street
Los Angeles CA

Michael Flynn
Attorney At Law
400 Atlantic Avenue
Boston MA